

**GISKAN SOLOTAROFF & ANDERSON LLP**  
Attorneys at Law

May 30, 2023

**VIA ECF**

Magistrate Judge Vera M. Scanlon  
United States District Court  
Eastern District of New York  
225 Cadman Plaza East  
Courtroom 13A South  
Brooklyn, New York 11201

**Re: Shrikant Barot v. St. John's University, Case No. 1:22-cv-04823 (NRM) (VAS)**

Dear Magistrate Judge Scanlon:

I represent the Plaintiff, Shrikant Barot, and members of the putative class in the above-referenced matter. I submit this joint discovery status letter on behalf of all parties in advance of the Status Conference scheduled for June 8, 2023.

The parties have served initial disclosures, have propounded initial document requests and interrogatories, and have served written responses and objections to the initial discovery requests. On May 16, 2023, the parties moved for entry of a Protective Order and Clawback Agreement ("Protective Order") [ECF Docket No. 19]. The parties are ready to produce responsive documents upon entry of the Protective Order. Plaintiff has proposed ESI custodians and search terms and the parties are in the process of scheduling a meet and confer on ESI. At this time, there are no outstanding discovery issues.

Respectfully Submitted,

By: /s/ Catherine E. Anderson

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cc: All counsel of record (via ECF)